

UNITED STATES DISTRICT COURT
District of Massachusetts
1 courthouse way, suite 2300
Boston, Massachusetts. 02210
617-748-9152

FILED
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2006 MAR 30 A 11:36

Rashid Jahm
Pro se
Plaintiff

U.S. DISTRICT COURT
DISTRICT OF MASS
Case No. 05-cv-11638-JLT
Jury Trial Demanded

Vs
Great American Insurance
Attorney for defendant
Patrick, T. Voke # 553033
175 Federal St, 10th Floor
Boston, MA. 02110
(617) 428- 0600

Plaintiff answer to Motion of Great American Insurance

Plaintiff file to move to court for Default judgment under Rule: 55 (a)(3) against Great American insurance. Defendant great American Insurance intentionally ignore to answer because claim handlers for legal malpractice are attorneys in Great American Insurance. knowingly has failed to answer within reasonable time under the rule 55.

Facts

Craig Noland was defendant in the Circuit court for falsifying, altering, and tampering. Defendant Craig Noland instructs the insurance about not giving policy detail. Plaintiff wanted to know what kind of coverage defendant Craig Noland has and if his policy cover all his wrongdoing under his policy.

- 1: Great American Insurance has duty under insurance law for doing insurance business for fair trade practice and owes good faith duty.
- 2: Great American Insurance chooses and listens to insured but Bad faith with plaintiff by not providing detail of his insurance.
- 3: Great American Insurance breaches the duty of trade in dealing with general public.
- 4: Great American Insurance ignore plaintiff and maliciously take the side of defendant. The insurer took the position that defendant probably can obtain a

defense verdict See, Riske v. Truck Insurance Exchange, 351 F.Supp. 76 (D.N.D. 1972

5: plaintiff wanted to know defendant policy if that there is enough coverage to pay for the judgment. That an excess judgment was returned against the insured. Unless great American was sure of outcome by defendant.

WHEREFORE Plaintiff request for relief trial by jury, discovery order. Or any other Court may find best.

Very Respectfully Submitted

DT: 03-10-06

Rashid Jahm
49 Hallenan Ave
Lawrence, MA.01841
(978) 258-9419

CC:

Document mailed by us postal to all
Patrick Dolan
John A. Christopher
Stephen J. Duggan
Juliana deHaan rice
George L. McCarger
Mark E. Donnelly (P39281) Pro Hac Vice
Robert P. Powers,
Thomas R. Meagher
Judy E. Bregman
Patrick, T. Voke # 553033

CERTIFICATE OF SERVICE

Dear Clerk

I hereby certify that a true copy of the foregoing document was served on all know parties herein by causing a copy of the same to be mailed, postage prepaid on March 29, 06.

Respectfully

Dated: 03-29-06

Rashid jahm
49 Hallenan Ave
Lawrence, MA.01841
978-258-9419